

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**ROBERT DAVID STEELE *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:17cv601**

**JASON GOODMAN *et al.*,**

**Defendants.**

**PATRICIA A. NEGRON'S RESPONSE TO DEFENDANT GOODMAN'S  
MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF**

NOW COMES Defendant, Patricia A. Negron ("Ms. Negron" or "Defendant"), by counsel, and in response to the Motion to Disqualify Counsel for Plaintiff ("Motion") filed by the Defendant, Jason Goodman ("Mr. Goodman" or "Defendant"), states as follows:

1. Ms. Negron takes no position with respect to Defendant Goodman's Motion to Disqualify Counsel for Plaintiff other than to say there is no concerted effort between Plaintiff Robert David Steele ("Plaintiff") and/or his attorney and Ms. Negron with respect to Mr. Goodman or anyone else.

2. Ms. Negron categorically denies that she has had any contact with Plaintiff's counsel or his agents or employees regarding this case.

3. Ms. Negron reiterates her assertion that the Plaintiff's case is without merit and filed for the sole purpose to harass and cause financial pain. The sheer volume of filings at this stage in the case, including but not limited to non-parties, are approaching the absurd. Mr. Goodman's pleadings are no better.

4. Moreover, Mr. Goodman's 110 page Motion includes Ms. Negron's personal information throughout, including a multipage "Been Verified" identity report. He included her

phone number and address history, employment information, the name and address of neighbors, social media sites, etc. Ms. Negron's personal information has no bearing on this case and is a classic example of doxing by Mr. Goodman, i.e. "publishing private or identifying information about (a particular individual) on the Internet, typically with malicious intent." Because the information in the report is no longer accurate, and given her accrued defense costs to date and the costs associated with further briefing and argument, Ms. Negron elected not to file a motion to strike. She respectfully, however, asks the Court to address this behavior by Mr. Goodman in future filings.

WHEREFORE, Defendant, Patricia A. Negron, hereby requests that the Court enter an Order (1) directing Mr. Goodman from refraining from publicly filing any document in this case that contains Ms. Negron's personal and identifying information and (2) awarding such further relief as the Court deems appropriate.

**PATRICIA A. NEGRON**

By: /s/ Terry C. Frank

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of December, 2019, a true copy of the foregoing is being electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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